

PETER S. CHRISTIANSEN, ESQ.

Nevada Bar No. 5254

pete@christiansenlaw.com

R. TODD TERRY, ESQ.

Nevada Bar No. 6519

tterry@christiansenlaw.com

WHITNEY J. BARRETT, ESQ.

Nevada Bar No. 13662

wbarrett@christiansenlaw.com

CHRISTIANSEN TRIAL LAWYERS

710 South 7th Street

Las Vegas, Nevada 89101

Telephone: (702) 240-7979

Facsimile: (866) 412-6992

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LAUREN L. LAVOIE, individually, LAUREN
L. LAVOIE, as Guardian and Natural Parent of
L.S., a Minor,;

Plaintiffs,

vs.

HYUNDAI MOTOR AMERICA, a Foreign
Corporation; HYUNDAI MOTOR COMPANY,
a Foreign Corporation; DOES I-X; ROES
CORPORATIONS I-X; inclusive,
Defendants.

CASE NO. 2:22-cv-00628-GMN-MDC

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFFS TO
FILE THEIR OBJECTION TO THE
MAGISTRATE'S REPORT AND
RECOMMENDATION [ECF NO. 54]**

[FIRST REQUEST]

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs Lauren L. Lavoie, individually and as Guardian and Natural Parent of L.S., a Minor ("Plaintiffs"), and Defendants Hyundai Motor America ("HMA") and Hyundai Motor Company ("HMC") (collectively, "Hyundai Defendants"), by and through their respective attorneys of record, that the deadline for Plaintiffs to file their objection to the Magistrate's Report and Recommendation [ECF No. 54], currently due June 11, 2024, be continued to June 14, 2024.

Plaintiffs' counsel seeks a three (3) day extension of the current deadline for the following reasons:



1 1. The extension is due to work-load issues and unanticipated scheduling conflicts of
2 Plaintiffs' current counsel, and in light of the crucial importance of the case dispositive sanctions
3 at issue, an extension of time is necessary to complete work on the objection. This is the first
4 stipulation for the requested extension.

5 2. Although Plaintiffs' counsel has begun preparing and will continue to diligently
6 work on the objection, additional time is needed due to work-load related issues and unanticipated
7 scheduling conflicts.

8 3. Thus, the parties stipulate and agree that the deadline for Plaintiffs to file an
9 objection to the Magistrate's Report and Recommendation to June 14, 2024. Additional time is
10 not expected or needed.

11 4. This stipulation is made in good faith and not to delay the proceedings.

12 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

13 Respectfully submitted this 10th day of June, 2024.

14 CHRISTIANSSEN TRIAL LAWYERS

15 /s/ Peter Christiansen

16 _____
17 PETER S. CHRISTIANSSEN, ESQ.

18 Nevada Bar No. 5254

19 R. TODD TERRY, ESQ.

20 Nevada Bar No. 6519

21 WHITNEY J. BARRETT, ESQ.

22 Nevada Bar No. 13662

23 710 South 7th Street

24 Las Vegas, NV 89101

25 *Attorneys for Plaintiffs*

BOWMAN AND BROOKE, LLP

/s/ Jeffrey Warren

PAUL G. CEREGHINI, ESQ.

Nevada Bar No. 10000

JEFFREY C. WARREN, ESQ. (*pro hac vice*)

Suite 1900, Phoenix Plaza

2929 North Central Avenue

Phoenix, Arizona 85012-2761

MARIO D. VALENCIA, ESQ.

Nevada Bar No. 6154

40 S. Stephanie St., Ste. 201

Henderson, Nevada 89012

Attorneys for Defendants

26 IT IS SO ORDERED.

27 DATED: June 11, 2024

28 
UNITED STATES DISTRICT COURT JUDGE

